

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

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|--------------------------|---|----------------------------|
| UNITED STATES OF AMERICA |) | CR. NO. <u>2:23-cr-636</u> |
| |) | |
| vs. |) | 18 U.S.C. § 371 |
| |) | 18 U.S.C. § 2320(a) |
| BRUCE QUIMBY AND |) | 18 U.S.C. § 981(a)(1)(C) |
| LISA QUIMBY |) | 28 U.S.C. § 2461(c) |
| |) | |
| |) | INFORMATION |

COUNT 1
(Conspiracy to Traffic in Counterfeit Goods)

THE UNITED STATES ATTORNEY CHARGES:

1. Beginning on or about August 2022 and continuing through June 2023, in the District of South Carolina, and elsewhere, the Defendants **BRUCE QUIMBY** and **LISA QUIMBY** (collectively, “**DEFENDANTS**”), together with others known and unknown to the United States Attorney, did knowingly and willfully conspire, agree, and have a tacit understanding to traffic and attempt to traffic counterfeit goods, in violation of Title 18, United States Code, Section 2320(a)(1).

Manner and Means of the Conspiracy

2. At all times relevant to this Information, it was part of the conspiracy that the **DEFENDANTS** did purchase counterfeit U.S. Forever Stamps from China for the purpose of selling them online.

Overt Acts

3. In furtherance of the conspiracy and to accomplish the object of the conspiracy, **DEFENDANTS**, with others known and unknown to the United States Attorney, committed overt acts within the District of South Carolina, and elsewhere, including but not limited to the

following:

- a. On or about August 19, 2022, 500 rolls of counterfeit U.S. Forever Stamps were delivered to **DEFENDANTS**.
- b. On or about October 18, 2022, the **DEFENDANTS** sold five rolls of counterfeit U.S. Forever Stamps, via an online sales platform, to T.G. of Boulder, CO. The counterfeit stamps were delivered on or about October 21, 2022.
- c. On or about January 1, 2023, 500 rolls of counterfeit U.S. Forever Stamps were delivered to **DEFENDANTS**.
- d. On or about February 25, 2023, the **DEFENDANTS** sold two rolls of counterfeit U.S. Forever Stamps, via an online sales platform, to C.R. of Stevens Point, WI. The counterfeit stamps were delivered on or about March 3, 2023.

All in violation of Title 18, United States Code, Section 371.

FORFEITURE

CONSPIRACY TO TRAFFIC IN COUNTERFEIT GOODS:

Upon conviction to violate Title 18, United States Code, Section 371 (conspiracy to violate 18 U.S.C. § 2320) as charged in this Information the Defendants, **BRUCE QUIMBY** and **LISA QUIMBY**, shall forfeit to the United States any property, real or personal, which constitutes, is traceable, or is derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation.

PROPERTY:

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), the property which is subject to forfeiture for the violation charged in this Information includes, but is not limited to, the following:

A. **Cash Proceeds / Forfeiture Judgment:**

A sum of money equal to all proceeds the Defendants obtained directly or indirectly as the result of the offense charged in this Information, or traceable to such property, that is, a minimum of \$609,900.00 in United States currency, and all interest and proceeds traceable thereto.

B. **Bank Account:**

\$92,405.50. in funds seized from Bluevine Bank Account
Account Number: x3785
In the names of: WT Archive and Lisa Quimby

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants-

- A. Cannot be located upon the exercise of due diligence;
- B. Has been transferred or sold to, or deposited with, a third person;

- C. Has been placed beyond the jurisdiction of the court;
- D. Has been substantially diminished in value; or
- E. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendants up to the value of the forfeitable property.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

AMY BOWER Digitally signed by AMY BOWER
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